

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Civil Division**

TAQDEES MARIAM RAZZAQ
24660 Woolly Mammoth Terrace
Aldie, VA 20105

:
:

Plaintiff,

:

v.

: CA No.

UNITED STATES OF AMERICA
Serve: United States Attorney General
950 Pennsylvania Avenue, NW
Washington, DC 20530

:
:
:

AND

:

SERVE: United States Attorney
Eastern District of Virginia
2100 Jamieson Avenue
Alexandria, VA 22314

:
:
:

Defendant.

:

COMPLAINT

Come now the Plaintiffs by and through counsel, and for their Complaint state as follows:

1. Jurisdiction for this action is based on the Federal Tort Claims Act.
2. On or about October 7, 2020, Plaintiff Taqdees Mariam Razzaq was operating a vehicle and was involved in a motor vehicle collision with a vehicle owned by the United States of America and driven by an employee of the United States of America.
3. The United States of America vehicle was a Department of Homeland Security 2019 Jeep Grand Cherokee with Maryland tag no. 9ED0650 driven by Gregory Hugh McAleer.
4. The vehicle was driven by Gregory Hugh McAleer within the scope of his employment for the Defendant United States of America.

5. The aforesaid collision was caused by the negligence of the Defendant United States of America.

6. The collision was on Route 50 near the intersection with Pleasant Valley Road in Fairfax County, Virginia, at approximately 9:30 a.m. on October 7, 2020.

7. The collision occurred within the Commonwealth of Virginia.


8. The negligence of the Defendant included, failure to avoid colliding, failure to keep a proper distance, and fail to keep a proper look-out.

9. The collision occurred when the vehicle, driven by Gregory Hugh McAleer, slammed into the rear of the vehicle occupied by Plaintiff.

10. As a result of said collision, Plaintiff Taqdees Mariam Razzaq suffered personal injury and incurred medical bills, lost wages, property damage and related costs.

WHEREFORE, the Plaintiff Taqdees Mariam Razzaq demands judgment against the Defendant United States of America in the amount of EIGHTY THOUSAND DOLLARS (\$80,000.00).

Respectfully submitted,



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